

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315				
Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007
The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.				

11. NO. 1 AND NO. 2 CLINKER COOLERS, CLINKER HANDLING SYSTEM, AND CLINKER UNLOADING

Summary Description

The following is a narrative description of the No. 1 and No. 2 clinker coolers, clinker handling system, and clinker unloading regulated in this Tier I operating permit. This description is for informational purposes only.

The No.1 and No.2 clinker coolers reduce the temperature of clinker received from the No.1 and No.2 kilns by air cooling. The clinker handling system transfers clinker from the No. 1 and No. 2 clinker coolers to the clinker storage area or clinker silos.

Emissions associated with all clinker transfer points, the No.1 kiln to the No.1 drag chain and the No.2 kiln to the No.2 drag chain, are controlled by being enclosed, under negative pressure, and being vented through the kilns. Emissions associated with the transfer of clinker from the No. 1 and No. 2 drag chains to the No. 3 drag chain are controlled by enclosure and by a baghouse (BH1). Emissions associated with the transfer of clinker from the No. 3 drag chain to the No. 1 clinker elevator or to the No. 4 drag chain are controlled by enclosure and a baghouse (BH1). Emissions from the transfer points of the No. 4 drag chain to the No. 2 elevator to the No. 5 drag chain and into storage silos are controlled by being enclosed and by a baghouse (BH2). Emissions associated with the transfer of clinker from the No. 1 elevator to the No. 7 drag chain on to the stacking pipe are controlled by enclosure and by a baghouse (BH1). Emissions from the drag No. 7 stacking pipe to the clinker storage area are controlled by partial enclosure. Emissions of the transfer points from the No. 1 elevator to the stacker belt on to the belt stacker are controlled by enclosure and two baghouses (BH1 and BH3). Partial enclosure and a baghouse (BH3) control emissions of the transfer points from the belt stacker pipe to the clinker storage. Emissions from the No. 1 elevator to the clinker storage area are controlled by partial enclosure.

Clinker is imported from other plants by truck and railcar to the facility and belly-dumped into an enclosed below-grade hopper. A vibratory feeder moves the clinker from the hopper to a covered conveyor belt. The conveyor belt carries the clinker to a clinker elevator. The elevator carries the clinker to a drag conveyor, which discharges the clinker to one of three storage silos. Emissions from the elevator and the storage silos are controlled by Baghouse No. 2.

Table 11.1 describes the devices used to control emissions from the No.1 and No.2 clinker coolers and clinker handling system.

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Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Codes	Emissions Unit(s) / Process(es)	Emissions Control Device
F43	Transfer point, No. 1 kiln to cooler	Enclosed, under negative pressure to kiln
F44	Cooler to No. 2 drag chain	Enclosed, under negative pressure to kiln
F47	Transfer point, No. 2 kiln to cooler	Enclosed, under negative pressure to kiln
F48	Cooler to No. 2 drag chain	Enclosed, under negative pressure to kiln
F45	No. 1 drag to No. 3 drag	Baghouse No. 1
F49	No. 2 drag to No. 3 drag	Baghouse No. 1
F50	No. 3 drag to clinker elevator	Baghouse No. 1
F51	Clinker elevator to plenum box	Baghouse No. 1
F52	Plenum box to bin	Baghouse No. 1
F56, F57, F58, F59, F60	Transfer from No. 4 drag chain to the No. 2 elevator to the No. 5 drag chain and into storage silos	Baghouse No. 2
F49d, F49e, F49f	Transfer of imported clinker to underground hopper to conveyor to elevator and into storage silos	Enclosed conveyor and Baghouse No. 2
F62, F63	Transfer points from the No. 1 elevator to the stacker belt on to the belt stacker	Baghouse No. 1 and baghouse No. 3
F64	Transfer points from the belt stacker pipe to the clinker storage	Partial enclosure and baghouse No. 3
F65	Emissions from the drag No. 7 stacking pipe to the clinker storage area	Partial enclosure
F65a	Transfer from No. 1 elevator to the clinker storage area	Partial enclosure

Table 11.2 contains a summary of the requirements that apply to the No.1 and No.2 clinker coolers, the clinker handling system, and the clinker unloading system. Specific permit requirements are listed below Table 11.2.

Table 11.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Unit	Parameter	Permit Limits / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
11.1	BH1	PM PM ₁₀	PM – 2.26 lb/hr, 9.91 T/yr PM ₁₀ – 1.92 lb/hr, 8.42 T/yr	PTC No. 005-00004, Condition 1.1	11.5, 11.6, 11.7, 11.8
11.1	BH2	PM PM ₁₀	PM – 1.44 lb/hr, 0.32 T/yr PM ₁₀ – 1.22 lb/hr, 0.27 T/yr	PTC No. 005-00004, Condition 1.1	11.5, 11.6, 11.7, 11.8
11.1	BH3	PM PM ₁₀	PM – 0.51 lb/hr, 2.14 T/yr PM ₁₀ – 0.44 lb/hr, 1.82 T/yr	PTC No. 005-00004, Condition 1.1	11.5, 11.6, 11.7, 11.8
11.2	Clinker storage, conveyor transfer points, and bulk loading and unloading systems	Visible emissions	10% Opacity	PTC No. 005-00004, Condition 1.2; 40 CFR 60.62(c)	11.11, 11.12
11.3	Clinker handling system	Fugitive emissions	Reasonable control PM – 33.25 lb/hr, 16.84 T/yr PM ₁₀ – 7.47 lb/hr, 6.75 T/yr	PTC No. 005-00004, Condition 1.4	11.9, 11.10
11.4	Clinker handling system	Particulate matter	Process weight	IDAPA 58.01.01.702	None required

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Permit Limits / Standard Summary

11.1 Baghouses BH1, BH2, and BH3

The PM and PM₁₀ emissions from baghouses identified as BH1, BH2, and BH3 shall not exceed the emissions limits in Table 11.3.

Table 11.3 EMISSION LIMITS

Emissions Unit	PM		PM ₁₀	
	lb/hr	T/yr	lb/hr	T/yr
Baghouse 1 (BH1)	2.26	9.91	1.92	8.42
Baghouse 2 (BH2)	1.44	0.32	1.22	0.27
Baghouse 3 (BH3)	0.51	2.14	0.44	1.82

[PTC No. 005-00004, Condition 1.1, 01/29/99]

11.2 Clinker Storage, Conveyor Transfer Points, and Bulk Loading and Unloading Systems Opacity Limit

In accordance with 40 CFR 60.62(c), the permittee shall not cause to be discharged to the atmosphere from any affected facility any gases which exhibit 10% opacity, or greater.

[PTC No. 005-00004, Condition 1.2, 01/29/99; 40 CFR 60.62(c)]

11.3 Fugitive Emissions

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 33.25 lb/hr and 16.84 T/yr, and PM₁₀ emissions shall not exceed 7.47 lb/hr and 6.75 T/yr.

[PTC No. 005-00004, Condition 1.4, 01/29/99]

11.4 No person shall emit into the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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Operating Requirements

11.5 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the air pollution control equipment.

[PTC No. 005-00004, Condition 2.2, 01/29/99]

11.6 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for each of the baghouses listed in Permit Condition 11.1 that describes the procedures that will be followed to comply with General Provision 28 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 2.3, 01/29/99]

11.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 2.4, 01/29/99]

11.7(a) Clinker Throughput Limits

The clinker from truck and railcar unloading operations shall not exceed 55,000 tons per any consecutive 12-month period.

[PTC No. P-050314, Condition 2.4, 11/10/05]

Monitoring & Recordkeeping Requirements

11.8 Baghouse Pressure Drop

The permittee shall record the pressure drop across each baghouse on a weekly basis. The pressure drop shall be recorded as inches of water (H₂O) and the records shall be kept at the facility for the most recent five-year period. The records shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 3.1, 01/29/99]

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11.9 Reasonable Control Measures

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control emissions from this facility. The records shall include the type of control used (i.e., water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used.

[PTC No. 005-00004, Condition 3.2, 01/29/99]

11.10 Clinker Production

The permittee shall monitor and record the amount of clinker produced by each kiln daily. The amount of clinker produced shall be recorded in tons per day and kept at the facility for the most recent five-year period. The records shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 3.3, 01/29/99]

- 11.11 The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate emissions would exceed any emissions limit(s) set forth in this permit.

[General Provision F, PTC No. 005-00004, 01/29/99]

- 11.12 The permittee shall comply with the requirements in Appendix B.

[40 CFR 60, Subpart A]

11.13 Throughput Monitoring

The permittee shall monitor and record the amount of clinker unloaded for each month and for the most recent 12-month period. Records kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-050314, Condition 2.5, 11/10/05]

11.14 Performance Test

Within 60 days of achieving the maximum production rate of the clinker unloading system, but not later than 180 days after issuance of this permit, the permittee shall conduct a performance test in accordance with 40 CFR 60 Subpart F and 40 CFR 60.8.

[PTC No. P-050314, Condition 2.6, 11/10/05]

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12. CLINKER RECLAIM***Summary Description***

The following is a narrative description of the clinker reclaim process regulated in this Tier I operating permit. This description is for informational purposes only.

The clinker reclaim process transfers clinker from the clinker storage area and clinker storage silos to the No. 1, No. 2, and No. 3 clinker feed bins.

Emissions associated with the transfer points from the clinker storage area and the clinker silos (No. 1, No. 2, and No. 3) to the No. 3 clinker reclaim belt, including transfers to and from the No. 1 and No. 2 clinker reclaim belts, are controlled by an enclosure and a baghouse (BH4). Emissions associated with all clinker transfer points from the No. 3 reclaim belt to the No. 1, No. 2, and No. 3 clinker feed bins, including transfers to and from the No. 3 clinker elevator and the clinker drag chain, are controlled by baghouse BH6.

Table 12.1 describes the devices used to control clinker reclaim emissions.

Table 12.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Codes	Emissions Unit(s) / Process(es)	Emissions Control Devices
F65A, F65, F66, F67, F68, F69, F70, F71, F72, F73, F74, F75, F76	Transfer points from the clinker storage area, and from the clinker silos (No. 1, No. 2, and No. 3), to the No. 3 clinker reclaim belt, including transfers to and from the No. 1 and No. 2 clinker reclaim belts	Baghouse No. 4
F77, F78, F79, F80, F81	Transfer points from the No. 3 reclaim belt to the No. 1, No. 2, and No. 3 clinker feed bins, including transfers to and from the No. 3 clinker elevator and the clinker drag chain	Baghouse No. 6

Table 12.2 contains a summary of the requirements that apply to the clinker reclaim. Specific permit requirements are listed below Table 12.2.

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Table 12.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Unit	Parameter	Permit Limits / Standards Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
12.1	BH4	PM PM ₁₀	PM – 0.32 lb/hr, 0.61 T/yr PM ₁₀ – 0.27 lb/hr, 0.52 T/yr	PTC No. 005-00004, Condition 1.1	12.5, 12.6, 12.7, 12.9
12.1	BH6	PM PM ₁₀	PM – 0.63 lb/hr, 2.78 T/yr PM ₁₀ – 0.54 lb/hr, 2.36 T/yr	PTC No. 005-00004, Condition 1.1	12.5, 12.6, 12.7, 12.9
12.2	Fugitive emissions	PM, PM ₁₀	Reasonable control PM – 0.17 lb/hr, 0.77 T/yr PM ₁₀ – 0.09 lb/hr, 0.38 T/yr	PTC No. 005-00004, Condition 1.1; IDAPA 58.01.01.650	12.8, 12.10, 12.11
12.3	Clinker storage, conveyor transfer points, and bulk loading and unloading systems	Visible emissions	10% Opacity	40 CFR 60.62(c); PTC No. 005-00004, Condition 1.2	12.12, 12.13
12.4	Clinker reclaim process	Particulate matter	Process weight	IDAPA 58.01.01.702	None required

Permit Limits / Standard Summary

12.1 BH4 and BH6

The PM and PM₁₀ emissions from baghouses identified as BH4 and BH6 stacks shall not exceed the emissions limits listed in Table 12.3.

Table 12.3 EMISSIONS LIMITS

Emissions Unit	PM		PM ₁₀	
	lb/hr	T/yr	lb/hr	T/yr
Baghouse 4 (BH4)	0.32	0.61	0.27	0.52
Baghouse 6 (BH6)	0.63	2.78	0.54	2.36

[PTC No. 005-00004, Condition 1.1, 01/29/99]

12.2 Fugitive Emissions

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 0.17 lb/hr and 0.77 T/yr, and PM₁₀ emissions shall not exceed 0.09 lb/hr and 0.38 T/yr.

[PTC No. 005-00004, Condition 1.4, 01/29/99; IDAPA 58.01.01.650]

12.3 Clinker Storage, Conveyor Transfer Points, and Bulk Loading and Unloading Systems Opacity Limit

In accordance with 40 CFR 60.62(c), the permittee shall not cause to be discharged to the atmosphere from any affected facility any gases which exhibit 10% opacity, or greater. Opacity shall be determined using the procedures specified in IDAPA 58.01.01.625.

[PTC No. 005-00004, Condition 1.2, 01/29/99; 40 CFR 60.62(c)]

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12.4 Process Weight Particulate Matter Limitation

No person shall emit to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

Operating Requirements**12.5 Monitoring Equipment**

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment.

[PTC No. 005-00004, Condition 2.2, 01/29/99]

12.6 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for each of the baghouses listed in Permit Condition 12.1 that describes the procedures that will be followed to comply with General Provision 28 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 2.3, 01/29/99]

12.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within manufacturer or O&M manual specifications. Documentation of both manufacturer or O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 2.4, 01/29/99; IDAPA 58.01.01.322.06, 5/1/94]

12.8 Clinker Reclaim Process Rates

The clinker reclaim process rates shall not exceed 77 T/hr on a monthly average basis, and 382,737 T/yr.

[PTC No. 005-00004, Condition 2.6, 01/29/99]

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Monitoring & Recordkeeping Requirements

12.9 Baghouse Pressure Drop

The permittee shall record the pressure drop across each baghouse on a weekly basis. The pressure drop shall be recorded as inches of water (H₂O) and the records shall be kept at the facility for the most recent five-year period. The records shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 3.1, 01/29/99]

12.10 Reasonable control Measures

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control emissions from this facility. The records shall include the type of control used (i.e., water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used.

[PTC No. 005-00004, Condition 3.2, 01/29/99]

12.11 Clinker Reclaim

The permittee shall monitor and record the amount of clinker processed by finish grinding mills No. 1, No. 2, and No. 3 to demonstrate compliance with Permit Condition 12.8. The process rate for each mill shall be recorded as tons per day and kept at the facility for the most recent five-year period. The records shall be made available to DEQ representatives upon request.

[PTC No. 005-00004, Condition 3.4, 01/29/99]

- 12.12** The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate emissions would exceed any emissions limit(s) set forth in this permit.

[PTC No. 005-00004, General Provision F, 01/29/99]

Reporting

- 12.13** The permittee shall comply with the requirements in Appendix B.

[40 CFR 60, Subpart A]

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13. FINISH GRINDING AND ASSOCIATED HANDLING

Summary Description

The following is a narrative description of the finish grinding sources regulated in this Tier I operating permit. This description is for informational purposes only.

The finish grinding mills No. 1, No. 2, and No. 3 process clinker and gypsum into cement. The mills receive material from the clinker bins and the gypsum bin by conveyor. The two materials are ground, and conveyed by the elevator to the separator. (The No. 1 and No. 2 mills go to the No. 1 separator, and the No. 3 mill uses the No. 2 separator). The separator removes oversized particles and reintroduces them to the mill, and transfers the cement of appropriate size to the cement cooler. The No. 1 and No. 2 mills utilize two cement coolers in series (No. 1 and No. 2) the No. 3 mill has its own cement cooler (No. 3). Cement is transferred from the cement cooler by FK pump to one of 19 storage silos.

Emissions associated with the transfer of material to and from the following: Mill No. 1 and mill No. 2, No. 1 cement elevator, No. 1 separator, and No. 1 and No. 2 cement coolers (in series) are controlled by Baghouse 7 (BH7) and through enclosure in a building. Emissions associated with the transfer of gypsum are controlled only by an enclosure.

Emissions associated with the transfer of material to and from the following: Mill No. 3, No. 2 cement elevator, No. 2 separator, and (No. 3) cement cooler are controlled by BH8 and through enclosure in a building. Emissions associated with the transfer of cement to cement silos No. 1 through No. 14 are controlled by BH9. Emissions associated with the transfer of cement to cement silos No. 21 through No. 25 are controlled by BH3.

Table 13.1 describes the devices used to control finish grinding and associated handling emissions.

Table 13.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Code	Emissions Unit(s) / Process(es)	Emissions Control Device
F110-F114 F115-F119 F120-F129	Mill No. 1 and mill No. 2, No. 1 cement elevator, No. 1 separator, and No. 1 and No. 2 cement coolers (in series)	Baghouse No. 7
F112, F112a F117, F117a F134, F134a	Transfer of gypsum	Enclosure
F130-F136 F137-F144	Mill No. 3, No. 2 cement elevator, No. 2 separator, and (No. 3) cement cooler	Baghouse No. 8
F145-F158	Transfer of cement to cement silos No. 1 through No. 14	Baghouse No. 9
F159-F172	Transfer of cement to cement silos No. 21 through No. 25	Baghouse No. 3

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Table 13.2 contains a summary of the requirements that apply to the finish grinding and associated handling sources. Specific permit requirements are listed below Table 13.2.

Table 13.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Unit	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
13.1.1	BH7	PM, PM ₁₀	PM – 1.59 lb/hr, 5.21 T/yr PM ₁₀ – 1.35 lb/hr, 4.43 T/yr	Tier II Permit No. 005-00004, Condition 2.1.1	13.5, 13.6, 13.7, 13.9
13.1.1	BH8	PM, PM ₁₀	PM – 2.09 lb/hr, 6.86 T/yr PM ₁₀ – 1.78 lb/hr, 5.83 T/yr	Tier II Permit No. 005-00004, Condition 2.1.1	13.5, 13.6, 13.7, 13.9
13.1.1	BH9	PM, PM ₁₀	PM – 2.82 lb/hr, 9.26 T/yr PM ₁₀ – 2.40 lb/hr, 7.87 T/yr	Tier II Permit No. 005-00004, Condition 2.1.1	13.5, 13.6, 13.7, 13.9
13.1.2	BH5, BH6, BH7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	Tier II Permit No. 005-00004, Condition 2.1.2; IDAPA 58.01.01.625	2.8
13.2	Fugitive emissions	PM, PM ₁₀	Reasonable control PM – 3.19 lb/hr, 5.24 T/yr PM ₁₀ – 1.53 lb/hr, 2.41 T/yr	Tier II Permit No. 005-00004, Condition 2.2; IDAPA 58.01.01.650	13.4, 13.8, 13.9
13.3	Finish grinding process	Particulate matter	Process weight	IDAPA 58.01.01.702	None required

Permit Limits / Standard Summary

13.1 Baghouses BH7, BH8, BH9

- 13.1.1 The PM and PM₁₀ emissions from BH7, BH8, and BH9 shall not exceed the emissions limits in Table 13.3.

Table 13.3 EMISSION LIMITS

Emissions Unit	PM		PM ₁₀	
	lb/hr	T/yr	lb/hr	T/yr
Baghouse 7 (BH7)	1.59	5.21	1.35	4.43
Baghouse 8 (BH8)	2.09	6.86	1.78	5.83
Baghouse 9 (BH9)	2.82	9.26	2.40	7.87

[Tier II Permit No. 005-00004, Condition 2.1.1, 12/8/97; PTC No. 005-00004, 1/29/99]

- 13.1.2 Visible emissions from each baghouse stack shall not exceed 20% opacity for a period or periods aggregating no more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625 and as determined using DEQ's "Procedure's Manual for Air Pollution Control."
[Tier II Permit No. 005-00004, Condition 2.1.2, 12/8/97; IDAPA 58.01.01.625, 4/5/00]

13.2 Fugitive Emissions

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 3.19 lb/hr and 5.24 T/yr, and PM₁₀ emissions shall not exceed 1.53 lb/hr and 2.41 T/yr.

[Tier II Permit No. 005-00004, Condition 2.2, 12/8/97; IDAPA 58.01.01.650, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 13.3 No person shall emit into the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

Operating Requirements**13.4 Process Rates**

Each of three finish mills shall process no more than 77 T/hr on a monthly average basis, and 382,737 tons of total cement annually.

[Tier II Permit No. 005-00004, Condition 4.1, 12/8/97]

13.5 Baghouse Specifications

Each baghouse shall be operated and maintained in accordance with Ash Grove's Dust Collector Maintenance Plan attached as Appendix E. This plan specifies pressure drop ranges for operation of the baghouses at the facility. The content of the Plan may only be modified with written approval of DEQ. Modifications of the Plan shall not require modification of the Tier I operating permit and any approved modification of the Plan shall become a condition of this Tier I operating permit as though fully incorporated herein.

[Tier II Permit No. 005-00004, Condition 4.2, 12/8/97; Consent Order, Condition 17, 6/10/02]

13.6 Baghouse Maintenance

The permittee shall perform corrective maintenance within 48 hours of observing any visible emissions from any baghouse stack or baghouse structure.

[Consent Order, Condition 14, 6/10/02]

Monitoring & Recordkeeping Requirements

- 13.7 The permittee shall record the pressure drop, in inches of water, across BH7, BH8, and BH9 weekly and visual observations daily.

[Tier II Permit No. 005-00004, Condition 3.1, 12/8/97]

- 13.8 The permittee shall record the amount of cement, in tons, processed by each mill daily.

[Tier II Permit No. 005-00004, Condition 3.2, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007
<i>The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.</i>				

- 13.9 The permittee shall record daily the information requested in Permit Conditions 13.7 and 13.8. These records shall be maintained on file by the permittee for a minimum period of five years, and shall be made available to DEQ representatives upon request.

[Tier II Permit No. 005-00004, Condition 5, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

14. CEMENT LOADOUT

Summary Description

The following is a narrative description of the cement loadout process regulated in this Tier I operating permit. This description is for informational purposes only.

Cement is transferred from storage silos to railcar, truck, or packaging by a combination of screws, airslides, and elevators.

Table 14.1 describes the devices used to control cement loadout emissions.

Table 14.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Code	Emissions Unit(s) / Process(es)	Emissions Control Device
F196-F238	Emissions associated with truck loadouts and truck loading tanks A, B, and C/D, and the transfer points within those parameters	Baghouse 10
F173-F195	All other cement activity between the FK pumps and truck loading tanks	Baghouse 9

Table 14.2 contains a summary of the requirements that apply to the cement loadout. Specific permit requirements are listed below Table 14.2.

Table 14.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Unit	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
14.1.1	BH10	PM, PM ₁₀	PM – 0.31 lb/hr, 0.67 T/yr PM ₁₀ – 0.26 lb/hr, 0.57 T/yr	Tier II Permit No. 005-00004, Condition 2.1.1	14.4, 14.5, 14.7
14.1.1	BH9	PM, PM ₁₀	PM – 2.82 lb/hr, 9.26 T/yr PM ₁₀ – 2.40 lb/hr, 7.87 T/yr	Tier II Permit No. 005-00004, Condition 2.1.1	14.4, 14.5, 14.7
14.1.2	BH9, BH10	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	Tier II Permit No. 005-00004, Condition 2.1.2; IDAPA 58.01.01.650	14.5, 14.6
14.2	Cement loadout process	Fugitive emissions	Reasonable control PM – 15.83 lb/hr, 4.01 T/yr PM ₁₀ – 7.91 lb/hr, 2.00 T/yr	Tier II Permit No. 005-00004, Condition 2.2.1; IDAPA 58.01.01.650	14.4, 14.8, 14.9, 14.10, 14.11, 14.12, 14.13
14.3	Cement loadout process	Particulate matter	Process weight	IDAPA 58.01.01.702	None required.

Permit Limits / Standard Summary

14.1 Baghouse 9 (BH9) and Baghouse 10 (BH10)

14.1.1 The PM and PM₁₀ emissions from BH9 and BH10 shall not exceed the emissions limits in Table 14.3.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 14.3 EMISSION LIMITS

Emissions Unit	PM		PM ₁₀	
	lb/hr	T/yr	lb/hr	T/yr
Baghouse 10 (BH10)	0.31	0.67	0.26	0.57
Baghouse 9 (BH9)	2.82	9.26	2.40	7.87

[Tier II Permit No. 005-00004, Condition 2.1.1, 12/8/97]

- 14.1.2 Visible emissions from the baghouse stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625 and as determined using DEQ's "Procedure's Manual for Air Pollution Control."

[Tier II Permit No. 005-00004, Condition 2.1.2, 12/8/97; IDAPA 58.01.01.650]

- 14.2 The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 15.83 lb/hr and 4.01 T/yr, and PM₁₀ emissions shall not exceed 7.91 lb/hr and 2.00 T/yr.

[Tier II Permit No. 005-00004, Condition 2.2.1, 12/8/97; IDAPA 58.01.01.650]

- 14.3 No person shall emit to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

OPERATING REQUIREMENTS**14.4 Loadout Rates**

- 14.4.1 Rail loadout shall handle no more than 200 tons of cement per hour.

- 14.4.2 Truck loadout shall handle no more than 225 tons of cement per hour.

- 14.4.3 Packaging of cement into bags shall not exceed 75 tons of cement per hour.

- 14.4.4 No more than 382,737 tons of cement on an average annual basis will be shipped from the Ash Grove facility.

[Tier II Permit No. 005-00004, Condition 4.1, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315				
Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007
<i>The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.</i>				

14.5 Baghouse Specifications

Each baghouse shall be operated and maintained in accordance with Ash Grove's Dust Collector Maintenance Plan attached as Appendix E. This plan specifies pressure drop ranges for operation of the baghouses at the facility. The content of the Plan may only be modified with written approval of DEQ. Modifications of the Plan shall not require modification of the Tier I operating permit and any approved modification of the Plan shall become a condition of this Tier I operating permit as though fully incorporated herein.

[Tier II Permit No. 005-00004, Condition 4.2, 12/8/97;
Consent Order, Condition 17, 6/10/02]

14.6 Baghouse Maintenance

The permittee shall perform corrective maintenance within 48 hours of observing any visible emissions from any baghouse stack or baghouse structure.

[Consent Order, Condition 14, 6/10/02]

Monitoring & Recordkeeping Requirements

14.7 The permittee shall record the pressure drop, in inches of water, across BH9 and BH10 weekly and visual observations daily.

14.8 The permittee shall record the daily amount of cement, in tons, transferred from rail loadout.

14.9 The permittee shall record the daily amount of cement, in tons, transferred from truck loadout.

14.10 The permittee shall record the daily amount, in tons, of cement shipped in bags.

14.11 The permittee shall record the hours of operation per day of the rail loadout, truck loadout, and bag filling.

[Tier II Permit No. 005-00004, Condition 3, 12/8/97]

14.12 The permittee shall record, in a daily report, the information requested in Permit Conditions 14.7, 14.8, 14.9, 14.10, and 14.11. These records shall be maintained on site by the permittee for a minimum period of five years, and shall be made available to DEQ representatives upon request.

[Tier II Permit No. 005-00004, Condition 5, 12/8/97]

14.13 Using the information recorded in 14.12, once each month, the permittee shall calculate the average hourly process rate for the rail loadout, truck loadout, and bag filling for the previous month, and the total tons shipped based upon a 12-month rolling average.

[IDAPA 58.01.01.322.07, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

15. COAL HANDLING

Summary Description

The following is a narrative description of the coal handling process regulated in this Tier I operating permit. This description is for informational purposes only.

Coal handling involves the receiving, handling, processing, and storage of coal. Emissions associated with the transfer points from the dumping of coal to the coal elevator, including transfers to and from the coal hopper, coal belt, and coal elevator, are uncontrolled. Emissions associated with all transfers points from the coal silo to the No. 2 coal mill, including transfers to and from the No. 1 and No. 2 coal mills, are controlled by enclosure.

Table 15.1 describes the devices used to control coal handling emissions.

Table 15.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Code	Emissions Unit(s) / Process(es)	Emissions Control Device
F34, F35, F36, F37	Transfer points from the dumping of coal to the coal elevator, including transfers to and from the coal hopper, coal belt, and coal elevator	Uncontrolled
F38, F39, F40, F41	Transfers points from the coal silo to the No. 2 coal mill, including transfers to and from the No. 1 and No. 2 coal mills	Enclosed

Table 15.2 contains a summary of the requirements that apply to the coal handling process. Specific permit requirements are listed below Table 15.2.

Table 15.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
15.1, 15.3	Fugitive emissions	Reasonable control PM – 5.61 lb/hr, 0.74 T/yr PM ₁₀ – 1.40 lb/hr, 0.18 T/yr Process Rate Coal – 280 T/hr, 70,000 T/yr based on a 12 month rolling average	Tier II Permit No. 005-00004, Condition 2.1; IDAPA 58.01.01.650	15.4, 15.5
15.2	Particulate matter	Process weight	IDAPA 58.01.01.702	None required

Permit Limits / Standard Summary

15.1 Fugitive Emissions

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 5.61 lb/hr and 0.74 T/yr, and PM₁₀ emissions shall not exceed 1.40 lb/hr and 0.18 T/yr.

[Tier II Permit No. 005-00004, Condition 2.1, 12/8/97; IDAPA 58.01.01.650, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

15.2 No person shall emit to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

Operating Requirements

15.3 The coal hopper shall handle no more than 280 tons of coal per hour on an average hourly basis and 70,000 tons of coal per year, based on a 12 month rolling average.

[Tier II Permit No. 005-00004, Condition 4, 12/8/97; IDAPA 58.01.01.322.01, 5/1/94]

Monitoring & Recordkeeping Requirements

15.4 The permittee shall record, in tons per hour and tons per year, the amount of coal burned in the kiln systems.

[Tier II Permit No. 005-00004, Condition 3, 12/8/97]

15.5 The permittee shall record, in a daily report, the information requested in Permit Condition 15.4. These records shall be maintained onsite by the permittee for a minimum period of five years, and shall be made available to DEQ representatives upon request.

[Tier II Permit No. 005-00004, Condition 5, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
Location:	Inkom, Idaho		Date Modified/Amended:	January 5, 2006
			Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

16. CEMENT KILN DUST HANDLING

Summary Description

The following is a narrative description of the CKD handling process regulated in this Tier I operating permit. This description is for informational purposes only.

Cement kiln dust handling involves the transfer of CKD from the No. 1 kiln multiclone and ESP and the No. 2 kiln multiclone and ESP to either a 66-ton capacity bin where it awaits reintroduction to the kiln, or to the CKD waste storage and leaching tank.

Table 16.1 describes the devices used to control cement kiln dust handling emissions.

Table 16.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source Code	Emissions Unit(s) / Process(es)	Emissions Control Device
F109, F88, F98, F107	Transfer of CKD by the loader to waste storage	Uncontrolled
F96, F97, F101, F106, F99, F100, F102, F103, F104, F105	Transfer of CKD from the No. 2 kiln multiclone to the screw, from the screw to the elevator, and from the elevator to a second screw	Enclosed
F82, F83, F84, F85, F92, F87, F108, F93, F94, F95	Transfer of the CKD from the No. 1 kiln multiclone elevator, through the screws, and into the bin	Baghouse 11

Table 16.2 contains a summary of the requirements that apply to the CKD handling process. Specific permit requirements are listed below Table 16.2.

Table 16.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Unit	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
16.1	BH11	PM ₁₀	0.23 lb/hr, 1.0 T/yr	PTC No. 005-00004, Condition 1.1	16.6
16.2	BH11 and Conveyor Transfer points	Visible emissions	10% Opacity	40 CFR 60.62(c)	2.8
16.3, 16.5	CKD Handling Process	Fugitive emissions	Reasonable control PM – 1.81 lb/hr, 1.59 T/yr PM ₁₀ – 0.90 lb/hr, 0.80 T/yr Process rate CKD – 6 T/hr, 4,575 T/yr	Tier II Permit No. 005-00004, Condition 2.1; IDAPA 58.01.01.650	16.7, 16.8
16.4	CKD Handling Process	Particulate matter	Process weight	IDAPA 58.01.01.702	None required

Permit Limits / Standard Summary

16.1 Baghouse 11 (BH11)

The PM₁₀ emissions from BH11 shall not exceed 0.23 lb/hr and 1.0 T/yr.

[PTC No. 005-00004, Condition 1.1, 05/17/99]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

16.2 Baghouse BH No. 11 and Conveyor Transfer Point Opacity Limit

In accordance with 40 CFR 60.62(c), the permittee shall not cause to be discharged to the atmosphere from baghouse BH11 stack, any new screw conveyors associated with the dust scoop system, and the dust feed spout (bulk loading systems) any gases which exhibit 10% opacity, or greater. Opacity shall be determined using the procedures specified in IDAPA 58.01.01.625.

[PTC No. 005-00004, Condition 1.2, 05/17/99; IDAPA 58.01.01.625, 4/5/00; 40 CFR 60.62(c)]

16.3 Fugitive Emissions

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 1.81 lb/hr and 1.59 T/yr, and PM₁₀ emissions shall not exceed 0.90 lb/hr and 0.80 T/yr.

[Tier II Permit No. 005-00004, Condition 2.1, 12/8/97; IDAPA 58.01.01.650, 5/1/94]

16.4 No person shall emit into the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

Operating, Monitoring & Recordkeeping Requirements

16.5 Cement kiln dust waste storage shall receive no more than six tons of CKD per hour, and 4,575 tons of CKD per year.

[Tier II Permit No. 005-00004, Condition 4, 12/8/97]

16.6 The permittee shall operate and maintain the baghouses in accordance with the Dust Collector Maintenance Plan contained in Appendix E.

[Consent Order, Condition 17, 6/10/02]

16.7 The permittee shall record daily the amount, in tons, of CKD transferred to CKD waste storage.

[Tier II Permit No. 005-00004, Condition 3, 12/8/97]

16.8 The permittee shall record daily the information requested in Permit Conditions 16.9 and 16.10. These records shall be maintained onsite for a minimum period of five years, and shall be made available to DEQ representatives upon request.

[Tier II Permit No. 005-00004, Condition 5, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

17. UNPAVED ROADS***Summary Description***

The following is a narrative description of the unpaved roads regulated in this Tier I operating permit. This description is for informational purposes only.

Routine vehicular traffic on unpaved plant roads. Unpaved roadways are water sprayed on a regular basis.

Table 17.1 describes the devices used to control unpaved road emissions.

Table 17.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Segment No.	Emissions Unit(s) / Process(es)	Emissions Control Device
1,2,D, 3P, 3P1, 3Q, 3O, HR1, LR1, CKD, G1, G2, I1, S1, 3g, 3h, 3S, 3T, 3U	Unpaved Roads	Water sprayed on a regular basis

Table 17.2 contains a summary of the requirements that apply to the unpaved roads. Specific permit requirements are listed below Table 17.2.

Table 17.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
17.1	Fugitive Emissions	Reasonable control PM – 19.97 lb/hr, 16.58 T/yr PM ₁₀ – 7.19 lb/hr, 5.97 T/yr	Tier II Permit No. 005-00004, Condition 2.1; IDAPA 58.01.01.650	17.2, 17.3, 17.4

Permit Limits / Standard Summary**17.1 Fugitive Emissions**

The PM and PM₁₀ fugitive emissions shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 19.97 lb/hr and 16.58 T/yr, and PM₁₀ emissions shall not exceed 7.19 lb/hr and 5.97 T/yr.

[Tier II Permit No. 005-00004, Condition 2.1, 12/8/97; IDAPA 58.01.01.650, 4/5/00]

Operating Requirements

17.2 At all times, fugitive emissions shall be reasonably controlled by, but not limited to, the following methods, and as required in IDAPA 58.01.01.650 and 651:

- Using water sprays, chemicals, and dust suppressants on the plant property and unpaved roads.

[Tier II Permit No. 005-00004, Condition 4.1, 12/8/97]

17.3 Vehicle speed shall not exceed eight mph.

[IDAPA 58.01.01.322.01, 3/19/99]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring & Recordkeeping Requirements

- 17.4 The permittee shall record, semiannually, the number of applications of chemical dust suppressants on unpaved roads. These records shall be maintained onsite for a minimum period of five years, and shall be made available to DEQ representatives upon request.

[Tier II Permit No. 005-00004, Conditions 3 and 5, 12/8/97]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315

Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

18. PAVED ROADS***Summary Description***

The following is a narrative description of the paved roads regulated in this Tier I operating permit. This description is for informational purposes only.

Routine vehicular traffic on paved plant roads. Paved roadways in the plant are cleaned by a street sweeper on a regular basis.

Table 18.1 describes the devices used to control paved road emissions.

Table 18.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Segment No.	Emissions Unit(s) / Process(es)	Emissions Control Device
3A, 3B, 3C, 3D, 3E, 3F, 3FF, 3I, 3J, 3K, 3L, 3N, 3R, 3M	Paved roads	Cleaned by a street sweeper on a regular basis

Table 18.2 contains a summary of the requirements that apply to the paved roads. Specific permit requirements are listed below Table 18.2.

Table 18.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limits / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
18.1	Fugitive emissions	Reasonable control PM – 46.52 lb/hr, 16.12 T/yr PM ₁₀ – 10.01 lb/hr, 3.47 T/yr	Tier II Permit No. 005-00004, Condition 2.1; IDAPA 58.01.01.650	18.2, 18.3, 18.4

Permit Limits / Standard Summary**18.1 Fugitive Emissions**

Fugitive emissions PM and PM₁₀ shall be reasonably controlled, as required in IDAPA 58.01.01.650 and 651. The PM emissions shall not exceed 46.52 lb/hr and 16.12 T/yr, and PM₁₀ emissions shall not exceed 10.01 lb/hr and 3.47 T/yr.

[Tier II Permit No. 005-00004, Condition 2.1, 12/8/97; IDAPA 58.01.01.650, 4/5/00]

Operating Requirements

18.2 At all times, fugitive emissions shall be reasonably controlled by, but not limited to, the following methods, and as required in IDAPA 58.01.01.650 and 651:

- Routinely cleaning and maintaining all paved roads.

[Tier II Permit No. 005-00004, Condition 3.1, 12/8/97]

18.3 Vehicle speed shall not exceed eight mph.

[IDAPA 58.01.01.322.01, 3/19/99]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T1-050315				
Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
			Date Modified/Amended:	January 5, 2006
Location:	Inkom, Idaho		Date Expires:	December 17, 2007
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Monitoring & Recordkeeping Requirements

- 18.4 The permittee shall maintain records of the dates and sections of paved roads swept.
[IDAPA 58.01.01.322.07, 5/1/94]

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Permittee:	Ash Grove Cement Co.	Facility ID No 005-00004	Date Issued:	December 17, 2002
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Location:	Inkom, Idaho		Date Expires:	December 17, 2007

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19. INSIGNIFICANT ACTIVITIES

Activities and emissions units identified as insignificant under IDAPA 58.01.01.317.01(b)(i) are listed in the Tier I operating permit to qualify for a permit shield.

Table 19.1 INSIGNIFICANT ACTIVITIES

Description	Plant Location	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Operation of loading and unloading storage tanks	Two aboveground 500-gallon tanks and one 3000-gallon underground tank	(3)
Grinding aid and used oil tanks	Building No. 38 and No. 62	(3)
Operation, unloading, and storage of butane, propane, or LPG	Plant-wide	(4)
Combustion sources less than five MMBtu/hr using exclusively natural gas, butane, propane, and/or LPG	Plant-wide	(5)
Welding	Building No. 30 and throughout plant area	(9)
Cleaning and stripping activities using solutions containing less than 1% VOC by weight	Plant-wide	(26)
Water-based lubricants for metal working where the organic content of the lubricant is less than 10%	Buildings No. 30 and No. 48	(27)

- 19.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emissions units or activities beyond those required in the Facility-wide Permit Conditions.

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20. COMPLIANCE SCHEDULE

The following compliance schedule (Table 20.1) will be implemented by the permittee and DEQ in accordance with the June 10, 2002 consent order.

Table 20.1 COMPLIANCE SCHEDULE

Permit Conditions	Milestone	Deadline	Documentation/Reporting
20.1	Permittee shall submit facility-wide Tier II application	180 days after issuance of consent order	Issuance of completeness letter from DEQ to permittee
20.2	Obtain a Tier II operating permit	Within 90 days of completeness date or a later date as determined by DEQ	Issuance of Tier II permit to permittee
20.3	Apply for a revised Tier I operating permit	Within 30 days after issuance of the Tier II operating permit	Application to DEQ from permittee

- 20.1 Within 180 days of the effective date of the Consent Order, Ash Grove shall submit a complete application to modify its Tier II operating permit (No. 005-00004, issued December 8, 1997). The application to modify the Tier II operating permit shall include the following:
- 20.1.1 A prevention of significant deterioration (PSD) analysis for the kiln modifications in 1986 (used-oil burning), 1992 (whole-tire burning in kiln No. 2), and 1997 (modified-heat exchange system). The analysis for PSD increment shall be conducted according to DEQ guidelines.
- 20.1.2 A facility-wide modeling analysis for NO₂, CO, SO_x, Pb, PM₁₀ that demonstrates compliance with the ambient air quality standards (IDAPA 58.01.01.575).
[Consent Order, Condition 19, 6/10/02]
- 20.2 DEQ shall issue a modified Tier II operating Permit to the permittee within 90 days of receipt of a complete application or a later date as determined by DEQ.
[IDAPA 58.01.01.322.10.a.i, 4/5/00]
- 20.3 The permittee shall apply for a modification of the Tier I operating permit within 30 days of issuance of the modified Tier II operating permit to incorporate any new and modified permit terms and limitations into the Tier I operating permit.
[Consent Order, Condition 23, 6/10/02; IDAPA 58.01.01.322.10.a.i, 4/5/00]
- 20.4 The terms and conditions regarding the compliance schedule are supplemental to and do not sanction noncompliance with the underlying requirement of IDAPA 58.01.01.201 that no owner or operator may commence construction or modification of any stationary source, major facility, or major modification without first obtaining a PTC from DEQ.
[IDAPA 58.01.01.322.10.a.v, 5/1/94]

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21. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code § 39-108; IDAPA 58.01.01.122 (5/1/94) and 322.15.f (4/5/00); 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code § 9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
- [IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.
- [IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) charges are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15), and 70.7(d) and (e)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

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13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code § 39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit.
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit.
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code § 39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(c)(1); 40 CFR 70.5(d)]

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Renewal

18. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(III)]

- 18.1 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code . 39-108 and IDAPA 58.01.01.122.

[Idaho Code § 39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

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Compliance Schedule and Progress Reports

- 20.
- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
 - For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]**

Periodic Compliance Certification

- 21.
- The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
 - The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ;
 - The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;

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iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.d.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;

iv. Such other facts as DEQ may require to determine the compliance status of the source.

e. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

21.1 The permittee's reporting period for annual compliance certifications for all emissions units shall be from January 1 to December 31 of each year. The compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA within 30 days of the end of the specified reporting period.

21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;

21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit.

21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;

21.3.4 Such other facts as DEQ may require to determine the compliance status of the source.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended; 62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

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False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(III)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(III)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]

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General Provision B

28. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[General Provision B, PTC No. 005-00004, 05/17/99]